



# MEMO ENDORSED

December 17, 2020

**VIA ECF**

Honorable William H. Pauley III  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1920  
New York, New York 10007

**Re: Theresa Harrison v. The Port Authority of New York and New Jersey**  
**Docket No.: 1:17-cv-06281-WHP**

Dear Judge Pauley:

This office represents Defendant The Port Authority of New York and New Jersey in the above-referenced action. Defense counsel respectfully requests a two-week extension in which to file the parties' revised Joint Pretrial Order ("JPTO") and the Pretrial Conference. The current deadline for filing the Pretrial Order is January 12, 2021 and the Pretrial Conference is scheduled for January 21, 2021 at 10:30 a.m. This is the third request for an extension and Plaintiff's counsel consents to this request. An initial Pretrial Conference was held on September 30, 2020 and no trial date has been scheduled. The reasons for this request are as follows:

Counsel have been diligent in the preparation of the revised JPTO. However, due to the closure of the New York City Public Schools and the need for Defense counsel to take vacation time to care for her children, we will require additional time to finalize the JPTO. Counsel for Defendant will be utilizing vacation time from December 21, 2020 through January 8, 2021. This request is for extraordinary good cause, is the parties' third request for an extension to file the JPTO and will not unduly delay the proceedings.

We thank the Court for its consideration.

Respectfully submitted,

**Application granted. The parties shall submit their revised joint pre-trial order by January 26, 2021. The pre-trial teleconference is adjourned to February 4, 2021 at 3:30 p.m. The dial-in number for the teleconference is (888) 363-4749. The access code is 3070580.**

Dated: December 18, 2020  
New York, New York

By: /s/ Cheryl N. Alterman  
Cheryl N. Alterman, Esq.  
Direct Dial: 212-435-3431

SO ORDERED:

cc: Lisa Alexis Jones, Esq. (via ECF)

  
WILLIAM H. PAULEY III  
U.S.D.J.